THE BETHANIE GROUP INC (ABN 60 992 323 642) Modern Slavery Statement FY23



Chair's statement



The Bethanie Group Inc (Bethanie) continues to strive to ensure that Modern Slavery has no place in our operations or supply chain. We are committed to eradicating Modern Slavery in all forms and fostering equality and fairness in employment provisions and human rights.

Work to eradicate Modern Slavery through continuous identification and management of risk in our operations and supply chain will remain a focus going forward. Where possible, we will seek to engage outside of Bethanie to sustain and enhance efforts more broadly to eradicate this blight on modern society.

This statement was approved by the Bethanie Board on 1 December 2023.¹

Diana Forsyth Chair

Identify the reporting entity²

This is Bethanie's Modern Slavery Statement, prepared to meet the requirements of the *Modern Slavery Act 2018* (Cth) for the financial year ending 30 June 2023 (FY23). Bethanie is a not-for-profit incorporated association pursuant to the *Associations Incorporation Act 2015* (WA).



Mission

Our mission is to demonstrate the Love of God by positively changing the way Australians experience ageing - every customer, every family, every community, every day.

Describe the reporting entity's structure, operations and supply chains³

Bethanie's structure

Bethanie is an incorporated association which operates aged care services in Western Australia and is registered with the Australian Charities and Notfor-profits Commission (ACNC). Bethanie has three subsidiaries, Bethanie Housing Ltd, Bethanie Primary Care Limited and Vacant Beds Limited.

Bethanie has a relationship with the Churches of Christ in Western Australia (CoCWA). CoCWA oversees the direction of the organisation via a Board who decides on policy and gives strategic direction to the Chief Executive.

The appointments of all Bethanie Directors are approved by a Board of Trustees.

² See section (1)(a) of the Modern Slavery Act 2018 (Cth).

³ See section 16(1)(b) of the Modern Slavery Act 2018 (Cth).

The Bethanie Board is assisted by the following Board Committees, which consist of representatives drawn from both the Board and Executive:

- Services Review
- Audit & Risk Management

Nominations, Remuneration & Governance

Business Development

Bethanie's operations

Bethanie operates its services throughout Western Australia. Bethanie's business segments include:



Residential Care Services: This segment includes the provision of aged care services in nursing homes and aged care facilities.



Independent Living Unit Services: This segment includes the supply of accommodation in retirement villages and independent living unit villas. The sales of lease for life licences are also included in this segment.



Community Care Services: This segment covers the provision of community aged care service programs which are funded by the State and Commonwealth Governments.



Bethanie Projects: This segment mainly includes the costs associated with building construction supervision.



Community Housing: This segment includes the activities associated with the construction of community housing for Bethanie Housing and the provision of community housing for seniors.

Supply chain

Bethanie's procurement team and stakeholders continue to prioritise its preferred supplier base that supply maintenance, goods, consultancy services and agency staff. Spend with Bethanie's suppliers remains greater than \$50 million, with approximately 150 preferred (and other) approved suppliers.

Bethanie's procurement processes are supported by appropriate governance via procurement policies and procedures, along with Bethanie's Mission Discernment Framework prioritising its mission.

Risks of modern slavery practices in the operations and supply chains facing Bethanie⁴

Since its last statement, Bethanie's business areas and Mission has remained similar, meaning risks of Modern Slavery in its operations have not changed significantly. Within its operations, the greatest risks still appear to be with:

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1	Construction
2	Agency staff
3	Cleaning services
4	Pharmaceutical products
5	Food and grocery
6	Cleaning supplies
$\overline{7}$	Apparel and uniforms

Actions taken by Bethanie to assess and address these risks⁵

Bethanie's approach during FY23 is to consolidate the work completed during past years to lower the risk of Modern Slavery in its operations and supply chain by ensuring its actions become business-asusual.

Operations

Bethanie supports freedom of association and the right for employees to engage in collective bargaining, with or without the involvement of third parties.

In addition to the concerns about mitigating the potential of Modern Slavery, Bethanie deeply values its people and engages in ongoing work to enhance the experience of its employees.

Over the past year, Bethanie has implemented various measures to improve employee conditions and benefits. Some of these initiatives include:

- Improving its employee wellness program, including the publication of a regular Wellness Magazine.
- Reviewing and updating its Leave Policy.

Furthermore, over the next 12 months, Bethanie intends to:

- Commence negotiations of new enterprise agreements to give its employees a voice in relation to their terms and conditions of employment, minimum rates of pay and other entitlements, while also ensuring its enterprise agreements are up to date with recent legislative changes.
- Improve the salary packaging options available to employees, enabling them to maximise their take-home pay.

Supply Chain

To consolidate its actions to addressing risk in its supply chain, Bethanie has maintained a consistent approach by regularly reviewing suppliers across its supply chain. Assessing suppliers has become a business-as-usual activity, through:

- Clauses in standard contracts that require actions related to Modern Slavery.
- Modern Slavery information required as part of requests for tender.
- A review of the Modern Slavery status for key suppliers, including those with a significant labour content.

Describe how the reporting entity assesses the effectiveness of these actions⁶

Bethanie's approach to ensure its actions have become business-as-usual has ensured that risks of Modern Slavery in its operations are minimised. It is believed that the actions, as detailed earlier in this statement, have created awareness across Bethanie's employee and supplier groups.

This awareness is Bethanie's best way to decrease the risk of Modern Slavery in both its operations and its partners' operations.

Process of consultation with associated entities⁷

All associated entities have been consulted on Modern Slavery risks and the contents of Bethanie's Modern Slavery Statement FY23. These entities comply with Bethanie processes and policies and report regularly to Bethanie.

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